Goal 1: Clean Air and Global Climate Change
RESPONSES TO STATE & TRIBAL ISSUES

General Response to all Comments. EPA reviewed the Regional submissions and was pleased to find that states, tribes, and the Agency share many of the same concerns. This is demonstrated by the fact that many of the issues raised or identified in the Regional submissions have been incorporated directly into the Goal 1 architecture that is now out for public review and comment. For instance, several of the Regional papers highlighted priorities or concerns related to transported air pollutants, mercury, fine particles, air toxics, American Indian issues, indoor air quality, greenhouse gases, and diesel. All these issues, with measurable targets of achievement, are included in the draft strategic architecture.

The Regional submissions also included things such as pollution prevention, voluntary programs, innovation, air permitting, and improved tools and techniques. The Goal 1 Team believes that these sorts of issues fall in the category of *how* results will be achieved, and we intend to address these in the means and strategies narrative section of Goal 1. Still other issues noted in the Regional submissions describe suggested Federal program activities, funding concerns, regulatory issues, and program implementation issues. Some of the identified issues are the subject of ongoing discussions and commenting on them in the context of the Strategic Plan is not appropriate at this time. Other issues, such as those concerning program implementation or funding, will be addressed, if appropriate, in the annual program and grant guidance. However, in an effort to be responsive to comments on these activities, we have provided feedback on them in this document as well.

Detailed Responses. Detailed responses to the comments are provided below.

Next Steps. Now that EPA's draft strategic architecture has been disseminated for public review and comment and there is specific language to comment on, the Goal 1 Team encourages interested parties to review the draft architecture and submit additional comments and suggestions on ways to better address air and radiation issues in the Strategic Plan.

Topic: Diesel
Summary of State or Tribal Concerns or Issues Increase the focus on clean diesel activities and provide funding to support diesel reduction efforts.
Response from the Goal 1 Team We have included 2 strategic targets under Sub-objective 1.1.1 that address diesel emissions, and will be addressing diesel issues more fully in the narrative text that has not yet been developed.

Topic: Energy

Summary of State or Tribal Concerns or Issues

Energy development and its impact on air quality and state resources are not adequately addressed in the Outdoor Air objective. Advanced energy deployment should be addressed. EPA should be encouraging energy efficiency, green building, and development of renewable energy resources in areas of rapid population expansion and where efficiency opportunities exist.

Response from the Goal 1 Team

1. We recognize the air quality impacts of energy development and advanced energy deployment and design air programs in a way that supports national energy policy goals. The air quality impacts of energy development are addressed in Sub-objective 1.1.1. For instance, the impacts of energy development on air quality and program costs are included in economic projections and modeling supporting the timetable and level of required emission reductions under CAIR (see CAIR-related strategic targets under Sub-objective 1.1.1). Our efforts to promote energy efficiency and green power, and accelerate deployment of advanced technologies, are included Sub-objectives 1.5.1, 1.5.2, and 1.5.3. Our work on advanced technology related to motor vehicles is included in Sub-objective 1.6.1. All of these activities will be addressed more fully in the narrative text that has not yet been written.

2. EPA has also made some internal organizational changes to better address energy issues. The Office of Air Quality Planning and Standards within OAR recently underwent a re-organization that included the creation of a new Energy Strategies Group of the Sector Policies and Programs Division. This group focuses on developing new, innovative options for energy production in the U.S. Current activities include promotion of integrated gasification combined cycle (IGCC) plants for electricity production, gasification of alternative renewable fuels (e.g., biomass, solid waste and other waste feedstocks) and support for higher efficiency options for conventional pulverized coal units (e.g., super critical units, circulating fluidized beds, etc.). The Energy Strategies Group is also working with other Federal Agencies (e.g., DOE) to promote the deployment of advanced and alternative energy systems.

Topic: Mercury

Summary of State or Tribal Concerns or Issues

1. Propose mercury rules at the federal level that are similar to ones adopted in Region 1 states.

2. Continue and expand efforts to eliminate mercury use in schools and health care settings.

3. Identify and promote alternatives to various mercury-containing products.

4. Ensure stable funding, with increases as possible, for long term monitoring efforts including the Mercury Deposition Network and fish tissue monitoring.

5. Improve mercury emissions data for industrial, home heating, institutional and biomass boilers; sewage sludge incinerators, landfills, mobile sources, products and other suspected sources to assist with exploration of further emission reductions.

6. Tribes would like to see stricter controls for mercury, and increased monitoring of mercury.

Response from the Goal 1 Team

EPA has promulgated regulations to reduce mercury emissions from major sources of mercury including coal-fired power plants, industrial and commercial boilers, chlor-alkali facilities, and municipal waste and medical waste combustion facilities. States can develop more stringent standards than the federal regulations if they choose.

EPA is also active in the area of mercury in products, especially switches, relays, and measuring devices (which are the products most likely to contain mercury). The Office of Pollution Prevention and Toxic Substances is analyzing mercury use in products in order to inform Agency decisions about appropriate regulatory and non-regulatory actions. That Office also has programs targeted at mercury in schools, and Hospitals for a Healthy Environment, which aims to eliminate mercury containing products in hospitals. The Office of Solid Waste has a Schools Chemicals Cleanup Campaign.

OAR has ongoing efforts to improve our information about mercury emissions. Specifically, ORD is working with OAR to improve the emissions inventory for mobile sources and for landfills. As OAR works to develop area source standards under section 112(k) of the Clean Air Act we will develop better data on emissions from sewage sludge incinerators and small boilers. The existing AP-42 sections for fuel oil combustion, sewage sludge incinerators, wood waste and landfills have emissions factors. While many of these emissions factors carry low ratings, they should provide a reasonable screening value for assessing the need to develop locally specific emissions estimates for total mercury emissions. It is believed that a national emissions factor based upon more or newer data for mercury would not provide a significant improvement over the existing emissions factor in quantifying emissions from these sources. As with all emissions factors, use of emissions factors involves significant uncertainty when applied to specific situations. Obtaining locally specific emissions factors for fuel oil combustion and sewage sludge incineration may involve only collection and analyses of the material combusted. It is believed that analyses of the mercury content of fuels/waste would result in more accurate emissions estimates for mercury emissions from these combustion sources should the uncertainty

of emissions estimates derived from the existing AP-42 emissions factors be unacceptable.

Within the architecture of the Strategic Plan, there is a strategic target for reducing mercury emissions through the Clean Air Mercury Rule (see strategic target under Sub-objective 1.1.2, strategic target 3). Further, the OAR has identified atmospheric deposition and ecological monitoring data as one of two "critical data needs" for Goal 1 programs and activities, specifically for CAMR/CAIR program accountability and for addressing questions about the ecological response to changing mercury, sulfur, and nitrogen deposition. EPA agrees that implementation of dry speciated mercury measurements are needed to evaluate air quality models, better characterize our understanding of mercury deposition patterns in background and near source regions and to account for implementation progress of CAIR and CAMR that are designed to reduce mercury deposition over the next two decades. EPA is developing a dry Hg speciation network program that builds (and extends) off of available technologies, the existing National Atmospheric Deposition Program and our state, local agency and tribal partners.

Topic: Interstate Transport of Air Pollution

Summary of State or Tribal Concerns or Issues

1. The Outdoor Air objective underplays the air transport issues.

2. It is important that there be no backsliding relative to emissions requirements that may increase pollution being transported into the region, and that the authorities that states currently have to address transport are preserved.

3. Per Region 1, Federal support is requested by states for the following areas:
   - retaining states' ability to address transport into their borders through preservation of Section 126 and NSR provisions
   - implementing of control measures in upwind states through NOx RACT, VOC RACT, RACM and BACT
   - preserving state's rights under CAA section 177 to adopt California Low Emission Vehicle (LEV) standards
   - securing aircraft emission reductions and airport ground equipment emission reductions

Response from the Goal 1 Team

There are 4 strategic targets under Sub-objective 1.1.1 for measuring progress in implementing the Clean Air Interstate Rule (CAIR), which EPA promulgated to address the problem of regional transport of ozone, PM2.5, and precursor pollutant emissions across state boundaries in the Eastern U.S.

We are aware of the concern about backsliding and the states' preferences, and plan to address the issue in the implementation guidance for the proposed new PM2.5 and PMc standards.

We are aware of the states' concerns; none of the objectives or strategic targets suggests any reduction in states' rights.

On aircraft -- EPA is currently working with STAPPA/ALAPCO to support state and local

implementation of the NAAQS by reviewing and compiling appropriate control measures for possible inclusion in SIPs. We will also review potentially appropriate Federal measures.

Topic: State Implementation Plans

Summary of State or Tribal Concerns or Issues

Improve the process for developing and modifying State Implementation Plans (SIPs). States encourage EPA to embrace the NAS Air Quality Management Report recommendations developed in collaboration with the States. The Air Quality Regional Haze State Implementation Plan will also be a future priority/issue for states during the strategic plan timeframe. While the change in the SIP process is not expected to change the architecture of the Strategic Plan, it should be acknowledged.

Response from the Goal 1 Team

We are working to implement the Air Quality Management report recommendations on improving the process for developing and modifying SIPs. This will hopefully lead to more timely attainment/improvement in air quality per Sub-Objective 1.1.1. The changes in SIP processing will be addressed in the Means and Strategies section.

Topic: Greenhouse Gases /Global Warming

Summary of State or Tribal Concerns or Issue

1. The issue of global warming needs to be addressed.

2. States like Alaska are already beginning to experience impacts like increasing temperature and melting.

3. Per Region 1, Federal leadership and support is needed to:
   - develop common educational and informational materials on greenhouse gases and climate protection
   - reduce GHG emissions from the transportation sector using advanced technology vehicles
   - develop and use analytical tools for calculating GHG emission reductions and benefits
   - establish a federal GHG registry and mandatory GHG reporting
   - funding to support state and regional efforts to involve urban municipalities in climate control actions, such as development of municipal climate action plans

4. State contributions to energy efficiency and reduction in greenhouse gases should be acknowledged in the Greenhouse Gas section.

Response from the Goal 1 Team

EPA's greenhouse gas and climate change-related activities are included in Objective 1.5 and the underlying sub-objectives. These activities will be addressed more fully in the narrative text that

has not yet been written. Additionally, EPA's climate change research activities are discussed in a strategic target in Goal 4 under Sub-objective 4.4.2.

Topic: Permitting

Summary of State or Tribal Concerns or Issues

An issue resulting from increased energy development is processing the large volume of new permit requests. Air quality permits are primarily related to coal bed methane and natural gas developments. This problem has been exacerbated by the declining federal cost share which makes it difficult to provide adequate compensation packages to recruit and retain quality personnel.

Response from the Goal 1 Team

Permit fees are supposed to cover such issues. Permit issuance and review is prone to fluctuations in the business cycle due both to general economic conditions and government policies – this is nothing new. Regions should work with state permitting authorities to ensure their programs are adequately funded through permit fees and consider sponsoring training for state and regional personnel.

Topic: PM2.5

Summary of State or Tribal Concerns or Issues

1. The Outdoor Air objective is notably missing a target for fine particulates.

2. Per Region 1, Federal support is requested by our states in the following areas:
   - revise the NAAQS for PM2.5 by 2006 to better reflect the current science and health studies
   - support research into the underlying chemical transformation of secondary organics into fine particles and incorporate into accepted models to better characterize emission reduction requirements
   - update and improve PM2.5 emission factors
   - update NSPS for woodstoves to reflect control capability of new technology and remove exemption for outdoor wood-fired boilers
   - support 500 ppm sulfur heating oil requirements beginning in July 2007
   - work with states on securing long-term changes in the PM2.5 ambient monitoring requirements that would allow for the use of continuous monitors in lieu of the current FRM methodology

Response from the Goal 1 Team

There are 3 strategic targets under Sub-objective 1.1.1 that address reductions in the ambient concentration of fine particulates (PM2.5) and reductions in the emissions of fine particles from mobile sources. Particles will also be discussed in the narrative text that has not yet been written. The use of continuous monitors in lieu of the current methodology is being considered

within the context of OAR's identified "critical data need" for long-term atmospheric and ecological monitoring data.

EPA is currently reviewing the PM2.5 NAAQS to account for the latest science and health studies. We have proposed revisions to the NAAQS, and intend to make final decisions on this proposal by September 2006.

EPA recognizes several recent advancements in secondary organic aerosol formation processes and shares concerns with states and others regarding the current ability of chemical mechanisms in EPA models such as CMAQ. These concerns have been expressed to our partners in ORD responsible for model development. We expect to see a phasing in of newer chemical mechanisms as time and resources permit, and acknowledging the sometimes slow, but necessary, process of chemical mechanism development, testing and final implementation.

We are providing support to state agencies in updating and improving PM2.5 emissions factors through two programs. The first program is through the availability of improved source test methods that are specific for PM2.5. EPA has updated the preferred procedures to employ within EPA Method 202 to obtain condensable particulate matter emissions. EPA has made available two additional test methods specific for PM2.5. The first method provides particle sizing at 2.5 um of the filterable component. The second method implements the recommendations of the National Academy of Sciences to provide a PM2.5 sampling method based upon dilutions sampling of the source emissions. The availability of PM2.5 specific test methods will provide States the mechanisms to have source test data collected that can be used to develop improved PM2.5 emissions factors. The second program is the emissions factors development program. EPA's emissions factors development program has always relied primarily on data created by other stakeholders to update the available emissions factors. Previously, EPA acquired, evaluated, documented this data and revised paper documents containing these emissions factors. This process resulted in long delays in updating emissions factors and duplicated several activities. EPA is revising the emissions factors program to allow for increased participation by stakeholders in the program. The new emissions factors development process reduces the bottle neck by providing mechanisms to enhance and expedite the accession of individual source tests into a process where the majority of emissions factors are calculated automatically.

EPA is currently working with STAPPA/ALAPCO to support state and local implementation of the NAAQS by reviewing and compiling appropriate control measures, such as sulfur content requirements for home heating oil, for possible inclusion in SIPs.

EPA is addressing the ambient monitoring comment by proposing new performance based criteria for approval of PM2.5 Federal Equivalent Methods and Approved Regional Methods - a new approach that allows well performing methods in a specific network to be used to meet multiple monitoring objectives, including NAAQS and AQI.

Topic: Indian Country

Summary of Tribal Concerns or Issues

1. Increase each tribe's environmental program capacity for air programs.

2. Tribes need help to develop programs to control upwind sources that contribute to air pollution over tribal lands.

3. The minor source air rule needs to be finalized and implemented. Tribes need more technical assistance to develop capacity to address minor air pollution sources.

4. Tribes need help in assessing contamination from toxic aerial deposition in subsistence foods and traditional medicines.

5. Increase air monitoring in areas of special interest to the tribes.

6. Tribes would like to see stricter controls for mercury, and increased monitoring of mercury.

7. Many tribes do not know if their air is safe to breathe. EPA needs to do more to assist Tribes in gathering baseline information and interpreting it. In addition, by providing adequate funds and assistance we can help tribes develop their air programs based on clear objectives and the results of monitoring activities. Through a combination of monitoring and inspections, there will be an improvement in compliance results and measurable improvements in air quality.

8. Add a measure for the NAAQS that focuses on tribes.

9. The HUD houses that were built in 1970's were not designed to prevent black mold. This has significant impact on indoor air for our children, who are exhibiting increased asthma rates.

10. Assess indoor air quality and remediate indoor air quality problems, including radon.

Response from the Goal 1 Team

1. We understand this concern and are taking steps to help tribes increase their capacity for environmental programs given limited resources. These activities are addressed under Sub-objective 1.1.1 in a strategic target supporting the completion of tribal assessments and development of CAA programs. As more tribes develop advanced programs that require higher levels of support, resources available for other tribes are further strained. We are also working closely with the Indian General Assistance Program to see where resources can be leveraged to increase support of Air Quality Management Programs.
2. EPA provides resources to support tribes in making determinations on how to best address their individual air quality problems. This concern is addressed under Sub-objective 1.1.1 in a strategic target supporting tribal eligibility determinations to implement the CAA. Cross-jurisdictional concerns require careful attention to state and tribal authority and tribal sovereignty, as well as EPA and CAA authority. OAR has successfully supported tribal involvement in national air quality management policy and regulatory activities, and encourages tribes to participate in multi-jurisdictional efforts like Regional Planning Organizations. Tribes are also successfully accepting delegation of CAA authorities like

CAA §505(a)(2) which authorizes tribes to be treated as "affected states" under Title V of the CAA, and included in permitting actions off the reservation but within 50 miles of its boundaries.

3. EPA continues to support and advance gap-filling regulations to address new source construction in Indian country. The rules package has been approved by OAR and is moving towards publication in the Federal Register in 2006. These activities will be addressed more fully in the narrative text that has not yet been written.
4. EPA understands this concern and supports tribal involvement and assessment of toxics by supporting tribal activities involving fish tissue testing in New England, deposition monitoring at several reservations, and by supporting monitoring activities through direct tribal support and through competitive grants.
5. We support this request and are revising national air monitoring strategies, including a tribal air monitoring strategy. Tribes have been extensively involved in this process and one of the outcomes should be to better align tribal interests and national priorities to support tribal monitoring needs. Monitoring will be addressed in the narrative text.
6. EPA supports this comment under Sub-objective 1.2.1 and continues to develop and promote national strategies and rules to protect human health and the environment. Tribes have participated extensively in policy and regulatory activity related to mercury, and input from tribes is being considered as part of those processes. See also earlier responses related to mercury activities.
7. We agree with this comment and are developing measures to ensure that every tribe has access to data and support to make determinations about the quality of their air. This is supported under Sub-objective 1.1.1 in a strategic target on continuing tribally-driven assessments of their air quality, and is evidenced through efforts to work with tribes that have not been funded to do air quality related work and provide them with technical data, support, and analysis as requested.
8. We support this request and have added two strategic targets under Sub-objective 1.1.1 to focus on supporting tribal assessments and development of air quality management programs.
9. We shares this concern that there may be design concerns with tribal housing and climate effects in Indian country. There is no statutory authority to address indoor air quality issues, but we do support a number of training and outreach programs designed to equip tribes (and others) with knowledge, skills, and tools to understand, assess, and design plans to ameliorate indoor air quality issues like mold and radon.
10. This comment is addressed in the preceding response #9. Please refer also to additional comments on indoor air quality in other sections. Additional language will also be developed as narrative for the Strategic Plan supporting these activities.

Topic: Animal Feeding Operations

Summary of State or Tribal Concerns or Issues

CAFOs and other agriculture issues are not included. (submitted by Regions 7 & 8)

Response from the Goal 1 Team

A number of our clean air programs (Title V, NSR, regional haze, Environmental Justice, ambient monitoring, etc) are not specifically addressed in the Strategic Plan. The Strategic Plan discusses with a broad perspective what we will plan to accomplish over the next 5 years to achieve Clean Air. We have established strategic targets for ozone, PM, air toxics and discuss the "state of air quality that should be accomplished at various time increments, i.e. 2010, 2015, 2018). Many of our programs that that aid in meeting our strategic targets will be discussed in the Means and Strategies Section; these are the "tools" that will be used to reach our strategic targets. Although Concentrated Animal Feeding Operations (CAFOs) and agriculture issues are not specifically addressed in the Strategic Plan, the Agency is actively working on CAFOs through the Animal Feeding Operation (AFO) Air Compliance Agreement (ACA) and agriculture issues as warranted. With regard to CAFOs, a primary goal of the ACA is to provide the Agency with better emission estimates from this source category. This information will be used to determine which facilities are subject to CAA, CERCLA, and EPCRA requirements. Also, the Agency will continue its policy of addressing agriculture air issues as they are brought forward by our various stakeholders.

Additionally, in January 2006, EPA approved the set of Air compliance agreements for animal feeding operations (AFOs). Under these agreements, the AFOs will evaluate the air emissions from animal feeding operations and use this data to develop an effective regulatory program. A monitoring and research study is expected to begin later this year and will provide EPA with a body of air emissions science and data that can be used to develop a sound, reasonable and effective air emissions regulatory program. AFOs will also be addressed in the means and strategies narrative text that has not yet been written.

Topic: Prevention of Significant Deterioration

Summary of State or Tribal Concerns or Issues

Addressing air pollution issues associated with the Prevention of Significant Deterioration (PSD - sulfur dioxide) in Class 1 areas is an important state priority. Protection of Class I areas from air pollution is also a significant concern to tribes. EPA also needs to focus on prevention in clean areas, as required by Title 1, Part C of the CAA. This is a key issue for the West in general. Add sub-objectives or strategic targets that deal with prevention of air quality degradation in clean areas.

Response from the Goal 1 Team

We are going to try to add a strategic target addressing PSD, similar to the following: "Continue to maintain good air quality in areas meeting the National Ambient Air Quality Standards, evidenced by no increment violations or no new NAAQS violations in clean areas." If we

cannot add a strategic target, we will discuss PSD in the Means and Strategies section.

EPA is aware of the concerns with preventing air quality degradation in clean areas. EPA has recently collaborated closely with the Western States Air Resources Council (WESTAR) to develop a set of recommendations to improve the effectiveness and efficiency of the PSD program The recommendations are aimed at removing the complexity of the current program, while protecting air quality in attainment areas and in the nation's parks and wilderness areas. EPA views these recommendations as extremely valuable input as we revisit our current PSD regulatory and policy framework in the near future. We also welcome tribal input on not just the issues touched on by the WESTAR recommendations, but any issue of concern that deals with protecting clean areas through our PSD program.

Additionally, the projected effects of emission reductions and improved air quality from implementation of CAIR with existing programs were evaluated for national parks and Class I areas in the states covered by CAIR and included in cost/benefit analyses supporting the rule. As such, this issue is implicitly addressed by strategic targets under Sub-objective 1.1.1.

Topic: Indoor Air Quality

Summary of State or Tribal Concerns or Issues

1. Radon in drinking water should be addressed.

2. Indoor air strategies need improvement.

3. Reduce risk to public from indoor air pollution in general, with a special focus on reducing asthma triggers in the schools and radon exposure in Guam (Pacific Islands) and California.

Response from the Goal 1 Team

We are very sensitive to the ongoing need to ensure that we are offering a suite of approaches to delivering the best possible results for the indoor air program. Objective 1.2 addresses indoor air quality and Sub-objectives 1.2.1, 1.2.2, and 1.2.3 articulate newly-developed targets for related to radon, asthma, and schools. These new targets were arrived at through the recent OMB PART assessment of the indoor air program. We worked with OMB to develop these statements and targets, and believe that they are an improvement over the old ones. The means and strategies for achieving these targets will be described in the narrative text that has not yet been written.

At this time, OAR is not targeting radon in drinking water as a priority area. However, Regions, should they choose, may solicit grant proposals using the State Indoor Radon Grants to address this issue should it be a priority specific to their region. We also refer the commenter to the Office of Water response on this issue.

We agree that reducing asthma triggers in the schools and radon exposure in Guam (Pacific Islands) and California are important. Our radon, schools, and asthma programs are national programs, and as such, in the EPA strategic plan we do not target geographic locations. We suggest that Region 9 use the Regional Strategic plan as a vehicle to stress the importance of this issue.

Topic: Air Toxics

Summary of State or Tribal Concerns or Issues

It may be time for EPA to refocus its air toxics program. The MACT program allows risk-based off ramps to standards that should be technology-based. We are facing little progress with residual risk and urban air toxics, lack of an air toxics standard for new cars. Revitalize strategy for Air Toxics Program.

To address communities facing adverse disproportionate impacts, reduce risk from toxic air pollutants by using a community-based approach to achieve air toxics emission reductions.

Need better information about acceptable ambient exposure limits for air toxics to help in risk assessments to the public.

Help needed to reduce mobile sources emissions of not only NOx and SOx but air toxics.

Increase the focus on non-regulatory activities.

Response from the Goal 1 Team

We agree that the air toxics program faces challenges because much remains to be done to address requirements of the Clean Air Act (CAA). However, annually, 1.5 million tons fewer toxics are entering the air than in 1990 as a result of the maximum achievable control technology (MACT) program, and we expect these reductions to be even greater when the MACT standards all come into compliance in 2007. We have completed 16 area source standards and are working to develop standards for an additional 25. We have placed a priority on developing standards for those area source categories that contribute the greatest amount of toxicity-weighted hazardous air pollutants (HAP) in urban areas. To date, we have promulgated residual risk standards for one category (Coke Ovens) and expect to have completed 7 more by the end of Calendar Year 2006. We are exploring pollution prevention approaches for area sources and engaging with 5 industry groups to explore and pilot these ideas. We are also developing a flexible area source concept paper. We continue to develop the concept of a Total Facility Low Risk Demonstration (TFLRD) rule, which would allow individual facilities which are currently subject to technology-based standards to conduct their own risk assessments in order to demonstrate to us and to their local permitting authority that they present negligible health and environmental risks to their surrounding community. This will provide EPA with more accurate site-specific emissions information about low-risk sources and help to focus residual risk requirements on those sources which present significant risks. In addition, we are taking a hard look at the overall air toxics strategy. To that end, our office recently reorganized to create a Sectors Policies and Programs Division, which is further sub-divided to focus on the needs of particular sectors, and which also incorporates a monitoring policy group and a program design group, who will look at the overall design of the toxics program. Further, in the Outreach and Information Division under the new reorganization, groups have been established with a focus on voluntary initiatives.

As stated previously, as part of the reorganization of OAQPS, within the new Outreach and Information Division, we have a new group titled, “Tribal, Community, and Urban Programs Group,” reflecting the importance that OAQPS is placing on community-based issues. We continue to develop web-based support tools for communities. We also participate through the

Agency-wide multi-media project, Community Action for a Renewed Environment (CARE). To improve our ability to characterize risks, EPA along with its State, local government, and tribal partners have a national air toxic monitoring network. The local component of the monitoring network comprises unique local scale monitoring projects designed to answer specific questions pertaining to local air toxic issues. Thirteen local scale projects were awarded in 2005. In 2006, we will award grants to communities to initiate 19 new local scale monitoring projects.

In a collaborative effort between Region 4 and Headquarters, EPA has recently issued a document entitled, "A Preliminary Screening Approach for Air Toxics Monitoring Data Sets" that provides information and methodologies which directly address this important topic. It is available on the web at: http://www.epa.gov/region4/air/airtoxic/athera1.htm

This document is currently being piloted for use in EPA Region 4, but its principles can be accessed and applied in any EPA Region. While it should be emphasized that EPA does not set ambient standards for air toxics, we continue to support the analysis and use of ambient air toxics monitoring to support local decision-making regarding potential air toxics exposures and the protection of public health, as well as to provide EPA important information which may affect national standards development for sources of air toxics.

As mentioned earlier, we have recently reorganized OAQPS, and now have a group, the Voluntary and Innovative Programs Group, who will help the office focus on non-regulatory approaches. In addition, as mentioned previously, we are pursuing some sector-based pollution prevention initiatives. We are also exploring developing programs and concepts that focus on multi-pollutants (toxics and criteria pollutants) to help encourage non-regulatory reductions that may get overall environmental improvements. One example of this is a pilot that we are exploring with the Pulp and Paper industry. Another one is a multi-pollutant pilot State Implementation Plan in Detroit.

Also, the Community Action for a Renewed Environment (CARE) program is a competitive grant program that offers an innovative way for communities to take action to reduce toxic pollution. Through CARE grants, communities create local collaborative partnerships that implement local solutions to reduce releases of toxic pollutants and minimize exposure to toxic pollutants. CARE is unique because it supports communities by providing tools, technical support, and funding to enable them to use *other* voluntary programs to reduce the emissions and exposures that the communities choose. CARE is focused on all types of exposure (air, water or land both indoor and outdoor).